

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE ENRON CORPORATION
SECURITIES LITIGATION

MDL Docket No. 1446

This Document Relates To:

CONNECTICUT RESOURCES RECOVERY
AUTHORITY,

Civil Action No. H-03-1558
(Consolidated)

Plaintiffs,

v.

KENNETH L. LAY, *et al.*,
Defendants.

**DEFENDANT JEFFREY K. SKILLING'S NOTICE OF JOINDER
AND JOINDER IN FINANCIAL INSTITUTIONS' MOTIONS TO DISMISS
THIRD AMENDED COMPLAINT (DOCKET NO. 544)**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that defendant Jeffrey K. Skilling will and hereby does move the Court to dismiss with prejudice all claims alleged in Plaintiff Connecticut Resources Recovery Authority's ("CRRA") Third Amended Complaint (Docket No. 530) on the grounds that, *inter alia*, CRRA (1) suffered no cognizable injury or loss and (2) lacks standing. As grounds for this motion, Mr. Skilling joins in and incorporates by reference the Financial Institutions' Joint Motion to Dismiss the Third Amended Complaint (Docket No. 544).¹

This joinder and motion to dismiss are based on and incorporate by reference the Financial Institutions' Joint Motion to Dismiss, the authorities cited therein, and all supporting evidence and other papers filed in connection with the Financial Institutions' Joint Motion to Dismiss—including but not limited to the Joint Memorandum in Support of Joint Motion to Dismiss the Third Amended Complaint (Docket No. 551), filed on August 15, 2007, and Joint Reply in Support of Motion to Dismiss (Docket No. 607), filed on January 30, 2008 filed by the Financial Institutions, the Supplemental Memorandum in Support of Joint Motion to Dismiss the Third Amended Complaint filed by the Deutsche Bank defendants (Docket No. 546), the Supplemental Memorandum in Support of Their Motion to Dismiss Plaintiff's Third Amended

¹ The "Financial Institutions" are JPMorgan Chase & Co., J.P. Morgan Securities Inc., JP Morgan Chase Bank, N.A., Merrill Lynch & Co., Merrill Lynch, Pierce, Fenner & Smith, Inc., Barclays Capital Inc., Barclays Bank PLC, Credit Suisse First Boston (USA), Inc., Credit Suisse First Boston LLC and Pershing LLC (f/k/a Donaldson, Lufkin & Jenrette Securities Corporation), Bank of America Corp., Banc of America Securities LLC, Deutsche Bank AG, Deutsche Bank Securities Inc., Deutsche Bank Trust Company Americas, Toronto-Dominion Bank, Toronto Dominion Holdings (U.S.A.), Inc., TD Securities, Inc., TD Securities (USA), Inc., Toronto Dominion Investments, Inc., Toronto Securities Ltd., Toronto Dominion (Texas), Inc., The Royal Bank of Scotland Group plc, The Royal Bank of Scotland plc, National Westminster Bank Plc, Greenwich Natwest Structured Finance, Inc. (Dissolved), Greenwich Natwest Ltd., Campsie Ltd., Royal Bank of Canada, Royal Bank Holding, Inc., Royal Bank DS Holding, Inc., RBC Dominion Securities Ltd., RBC Dominion Securities, Inc., Royal Bank of Canada Europe Ltd., RBC Holdings (USA) Inc., and RBC Dominion Securities Corp.

Complaint filed by the RBC defendants (Docket No. 549), the Supplemental Memorandum in Support of Joint Motion to Dismiss the Third Amended Complaint filed by the Barclays defendants (Docket No. 554)—as well as such other papers, evidence, and argument in support thereof that may properly be presented prior to or at the time of hearing.

Dated: July 31, 2013

Respectfully Submitted,

/s/ Daniel M. Petrocelli

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**ATTORNEY-IN-CHARGE FOR
DEFENDANT JEFFREY K. SKILLING**

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of July, 2013, I served the foregoing Notice of Joinder and Joinder in Financial Institutions' Motions to Dismiss the Third Amended Complaint (Docket No. 544) by filing it in the Court's Electronic Court Filing system, and relied upon that system's automatic service of this document upon counsel of record.

/S/ Daniel M. Petrocelli

Daniel M. Petrocelli